

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
TIFFANY MAY WILSON	:	CASE NO. 1-13-06432-RNO
Debtor	:	
	:	CHAPTER 13
JPMORGAN CHASE BANK, N.A.	:	
Movant	:	
	:	
v.	:	
	:	
TIFFANY MAY WILSON	:	
Respondent	:	

**DEBTOR'S RESPONSE TO MOTION OF
JPMORGAN CHASE BANK, N.A.
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, comes Debtor, Tiffany May Wilson, by and through her attorney, Gary J. Imblum, and respectfully responds as follows:

1. Admitted.
2. Admitted in part, denied in part. The Deed speaks for itself. Strict proof is demanded.
3. Admitted.
4. Admitted in part, denied in part. The mortgage speaks for itself. Strict proof is demanded.
5. Admitted in part, denied in part. Strict proof is demanded that JPMorgan Chase Bank, N.A. services the loan.
6. Admitted.
7. Admitted in part, denied in part. The exact amount of the post-petition arrearage is unknown. Strict proof is demanded. Further, Debtor has initiated a withdrawal from her 401K

sufficient to cure the post-petition arrearage. Debtor should have the funds by the end of August 2016. Once the amount of the post-petition arrearage is verified, Debtor will forward the necessary funds to Chase to cure the post-petition default. In this regard, a post-petition payment history is requested to verify the post-petition arrearage.

8. Admitted in part, denied in part. See response to paragraph 7.

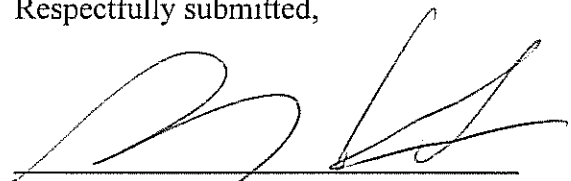
9. Admitted in part, denied in part. It is denied that relief from the co-debtor stay is warranted. See response to paragraph 7.

10. Denied. The amount owed to Movant exceeds the fair market value of the property. Accordingly, Movant is not entitled to Attorney's fees and costs.

11. Denied. See response to paragraph 10.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



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DATED: _____

8/16/16

CERTIFICATION OF SERVICE

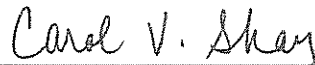
I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTOR'S RESPONSE TO MOTION OF JPMORGAN CHASE BANK, N.A. FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J. DEHART III ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

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JOSHUA I. GOLDMAN, ESQUIRE
COUNSEL FOR MOVANT
VIA E-SERVICE

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DATED: 8/15/16